

1 MICHAEL C. ORMSBY  
2 United States Attorney  
3 Eastern District of Washington  
4 Earl A. Hicks  
5 Assistant United States Attorney  
Post Office Box 1494  
Spokane, WA 99210-1494  
Telephone: (509) 353-2767

FILED IN THE  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

**2:16-CR-207-RMP**

**INDICTMENT**

11 UNITED STATES OF AMERICA,  
12 Plaintiff,

13 vs.

15 TERRY RUSSELL HUNT,  
16 MARY ALICE HUNT,  
17 RUSSELL MELVIN HUNT, and  
DEREK JON HUNT,  
18 Defendants.

Vio: 18 U.S.C. §§ 371,  
922(a)(1)(A), 923(a)  
Conspiracy to Deal  
Firearms Without a  
Firearms License  
(Count 1)

Vio: 18 U.S.C. §§ 922(a)(1)(A),  
923(a), 924(a)(1)(D)  
Dealing in Firearms Without a  
License  
(Count 2)

Vio: 18 U.S.C. §§ 922(a)(6), 924(a)(2)  
False Statement in the  
Purchase of a Firearm  
(Counts: 3-16)

18 U.S.C. § 924(d)(1) and  
28 U.S.C. § 2461(c)  
Forfeiture Allegations

24 The Grand Jury charges that:

25 COUNT 1

26 Beginning on an exact date unknown but by on or about June 12, 2011, and  
27 continuing through on or about December 2, 2015, in the Eastern District of Washington

1 and elsewhere, to include the Western District of Washington and the District of Nevada,  
2 Defendants TERRY RUSSELL HUNT, MARY ALICE HUNT, RUSSELL MELVIN  
3 HUNT, and DEREK JON HUNT, did knowingly and intentionally combine, conspire,  
4 confederate and agree with each other and with other persons, both known and unknown,  
5 to commit the following offense against the United States, namely to engage in the  
6 business of dealing in firearms without a federal firearms license, in violation of 18  
7 U.S.C. §§ 922(a)(1)(A), 923(a), and one or more of the Defendants committed an overt  
8 act to effect the object of the conspiracy, including but not exclusively, the sale of  
9 firearms alleged in Paragraphs A through F of this Count, all said sales occurring  
10 between on or about June 12, 2011, and on or about December 2, 2015, which are hereby  
11 incorporated by reference:

- 12 A. Sale of Smith and Wesson, Model Bodyguard, .380 Caliber Pistol, bearing  
13 serial number EBR8323, purchased by MARY HUNT, and later sold on or  
14 about August 17, 2012;
- 15 B. Sale of Glock, Model 42, .380 Caliber Pistol, bearing serial number  
16 AAWT524, purchased by TERRY HUNT and later sold on or about  
17 November 14, 2014;
- 18 C. Sale of Smith and Wesson, Model M&P, 9mm Caliber Pistol, bearing serial  
19 number HVS5690, purchased by TERRY HUNT and later sold on or about  
20 August 14, 2015;
- 21 D. Sale of Glock, Model 42, .380 Caliber Pistol, bearing serial number  
22 ABEZ086, purchased by TERRY HUNT and later sold on or about August  
23 14, 2015;
- 24 E. Sale of Smith and Wesson, Model Bodyguard, .38 Caliber Revolver, bearing  
25 serial number CXZ3044, purchased by TERRY HUNT and later sold on or  
26 about August 14, 2015;

1 F. Sale of Taurus, Model "The Judge," 45/410 Caliber Revolver, bearing serial  
2 number BS632662, purchased by DEREK HUNT and later sold on or about  
3 August 14, 2015.

4 In addition to the overt acts alleged in A through F above, at least one or more of  
5 the following overt acts were committed in the course of and in furtherance of the  
6 conspiracy.

7 G. On November 1, 2012, Daniel Thomas Hammock illegally purchased four  
8 (4) firearms at the Cascade Arms Co. located in Olympia, WA, within the  
9 Western District of Washington, for Terry Russell Hunt who told Hammock  
10 that he was going to sell the firearms at the Reno Gun Show. This took place  
11 after Terry Russell Hunt was advised by ATF on April 18, 2012, that he  
12 could not sell firearms at the Reno Gun Show without first obtaining a  
13 Federal Firearm License.

14 H. On March 25, 2013, Daniel Thomas Hammock illegally purchased four (4)  
15 firearms at the Cascade Arms Co. located in Olympia, WA, within the  
16 Western District of Washington for Terry Russell Hunt who told Hammock  
17 that he was going to sell the firearms at the Reno Gun Show. This took place  
18 after Terry Russell Hunt was advised by ATF on April 18, 2012, that he  
19 could not sell firearms at the Reno Gun Show without first obtaining a  
20 Federal Firearm License.

21 I. On August 9, 2013, Daniel Thomas Hammock illegally purchased four (4)  
22 firearms at the Cascade Arms Co. located in Olympia, WA, within the  
23 Western District of Washington for Terry Russell Hunt who told Hammock  
24 that he was going to sell the firearms at the Reno Gun Show. This took place  
25 after Terry Russell Hunt was advised by ATF on April 18, 2012, that he  
26 could not sell firearms at the Reno Gun Show without first obtaining a  
27 Federal Firearm License.

J. On the dates listed below one or more of the Defendants traveled to the Reno Gun Show, located in Reno Nevada, within the District of Nevada, for the purpose of selling firearms, which the Defendants had purchased in the Eastern and Western Districts of Washington. Each date constitutes a separate overt act in the furtherance of the Conspiracy charged in this count of this Indictment.

- i. August 17-19, 2012
  - ii. November 16-18, 2012
  - iii. April 11-14, 2013
  - iv. August 15-18, 2013
  - v. November 22-24, 2013
  - vi. April 18-20, 2014
  - vii. August 15-18, 2014
  - viii. November 14-16, 2014
  - ix. March 27-29, 2015
  - x. August 14-16, 2015

K. The allegations alleged in Counts 3 through 16 of this Indictment are each separately alleged as a separate overt act taking place during and in furtherance of the conspiracy alleged in this Count of this Indictment.

All in violation of 18 U.S.C. § 371.

COUNT 2

Beginning on an exact date unknown but by on or about June 12, 2011, and continuing through on or about December 2, 2015, in the Eastern District of Washington and elsewhere, to include the Western District of Washington and the District of Nevada, the defendants TERRY RUSSELL HUNT, MARY ALICE HUNT, RUSSELL MELVIN HUNT, and DEREK JON HUNT not being licensed dealers of firearms within the meaning of Chapter 44, Title 18, United States Code, did wilfully engage in the business

1 of dealing in firearms, in violation of 18 U.S.C. §§ 922(a)(1)(A), 923(a), 924(a)(1)(D)  
2 and 18 U.S.C. § 2.

3 COUNT 3

4 On or about November 13, 2012, in the Eastern District of Washington, the  
5 Defendant, DEREK JON HUNT, in connection with the acquisition of firearms, to wit: a  
6 Glock Model 26, 9mm pistol, bearing serial number TVL444, and a Kimber 45 caliber  
7 pistol, bearing serial number KU198569, from H.O.T.S., Inc.; Hooked on Toys, 1444 N.  
8 Wenatchee, Ave., Wenatchee, WA, a licensed dealer of firearms within the meaning of  
9 Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written  
10 statement to G.R., which statement was intended and likely to deceive G.R., as to a fact  
11 material to the lawfulness of such sale of said firearms to the Defendant under Chapter 44  
12 of Title 18, in that the defendant represented that he was purchasing said firearms for  
13 himself when he knew he was purchasing the firearms for resale to another person; in  
14 violation of 18 U.S.C. §§ 922(a)(6), 924(a)(2).

15 COUNT 4

16 On or about April 26, 2013, in the Eastern District of Washington, the Defendant,  
17 DEREK JON HUNT, in connection with the acquisition of firearms, to wit: a Glock  
18 Model 23 Gen 4, .40 caliber pistol, bearing serial number UKR 175, and a Sig-Sauer  
19 Mosquito .22LR caliber pistol, bearing serial number F183033, from Northwest Pawn &  
20 Collector Arms, 818 N. Pines Road, Spokane, WA, a licensed dealer of firearms within  
21 the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and  
22 fictitious written statement to K.B. which statement was intended and likely to deceive  
23 K.B., as to a fact material to the lawfulness of such sale of said firearms to the Defendant  
24 under Chapter 44 of Title 18, in that the Defendant represented that he was purchasing  
25 said firearms for himself when he knew he was purchasing the firearms for resale to  
26 another person; in violation of 18 U.S.C. §§ 922(a)(6), 924(a)(2).

1 COUNT 5  
2

3 On or about July 31, 2015, in the Eastern District of Washington, the Defendant,  
4 DEREK JON HUNT, in connection with the acquisition of firearms, to wit: a Glock  
5 Model 30, .45 caliber pistol, bearing serial number EZC105US, and a Taurus Model  
6 M4510, THE JUDGE .45/410 caliber revolver, bearing serial number BSE632662, and a  
7 Smith and Wesson Model SW9VE, 9mm pistol, bearing serial number RAY1900, and a  
8 Smith and Wesson Model 617-6 .22LR caliber revolver, bearing serial number  
9 CYH3048, and a Springfield Model XD 45, .45 caliber pistol, bearing serial number  
10 US678545 from Northwest Pawn & Collector Arms, 818 N. Pines Road, Spokane, WA, a  
11 licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States  
12 Code, knowingly made a false and fictitious written statement to K.B. which statement  
13 was intended and likely to deceive K.B., as to a fact material to the lawfulness of such  
14 sale of said firearms to. the Defendant under Chapter 44 of Title 18, in that the defendant  
15 represented that he was purchasing said firearms for himself when he knew he was  
16 purchasing the firearms for resale to another person; in violation of 18 U.S.C. §§  
922(a)(6), 924(a)(2).

17 COUNT 6  
18

19 On or about, April 26, 2013, in the Eastern District of Washington, the Defendant,  
20 RUSSELL MELVIN HUNT, in connection with the acquisition of firearms, to wit: a  
21 Glock Model 35, .40 caliber pistol, bearing serial number TWR685, and a Sig-Sauer,  
22 Model 1811 Ultra Compact, .45 caliber pistol, bearing serial number 54A013587, from  
23 Northwest Pawn & Collector Arms, 818 N. Pines Road, Spokane, WA, a licensed dealer  
24 of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly  
25 made a false and fictitious written statement to K.B. which statement was intended and  
26 likely to deceive K.B., as to a fact material to the lawfulness of such sale of said firearms  
27 to the Defendant under Chapter 44 of Title 18, in that the Defendant represented that he  
28 was purchasing said firearms for himself when he knew he was purchasing the firearms  
for resale to another person; in violation of 18 U.S.C. §§ 922(a)(6), 924(a)(2).

1  
2 COUNT 7  
3

4 On or about December 5, 2014, in the Eastern District of Washington, the  
5 Defendant, RUSSELL MELVIN HUNT in connection with the acquisition of firearms, to  
6 wit: a Sig-Sauer Mosquito .22 caliber pistol, bearing serial number F023918, and a  
7 Kimber Ultra Carry II .45 caliber pistol, bearing serial number KU25816, from Stan's  
8 Merry Mart, Inc.; 733 S. Wenatchee Ave., Wenatchee, WA, a licensed dealer of firearms  
9 within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false  
10 and fictitious written statement to E.R. which statement was intended and likely to  
11 deceive E.R., as to a fact material to the lawfulness of such sale of said firearms to the  
12 Defendant under Chapter 44 of Title 18, in that the defendant represented that he was  
13 purchasing said firearms for himself when he knew he was purchasing the firearms for  
14 resale to another person; in violation of 18 U.S.C. §§ 922(a)(6), 924(a)(2).  
15

16 COUNT 8  
17

18 On or about November 20, 2012, in the Eastern District of Washington, the  
19 Defendant, RUSSELL MELVIN HUNT, in connection with the acquisition of firearms,  
20 to wit: a Glock Model 26, 9mm pistol, bearing serial number TMH232, and a Glock  
21 Model 19 9mm pistol, bearing serial number THN666, from White Elephant #1, 1730 N.  
22 Division, Spokane, WA, a licensed dealer of firearms within the meaning of Chapter 44,  
23 Title 18, United States Code, knowingly made a false and fictitious written statement to  
24 D.B. which statement was intended and likely to deceive D.B., as to a fact material to the  
lawfulness of such sale of said firearms to the defendant under Chapter 44 of Title 18, in  
that the Defendant represented that he was purchasing said firearms for himself when he  
knew he was purchasing the firearms for resale to another person; in violation of 18  
U.S.C. §§ 922(a)(6), 924(a)(2).  
25

26 COUNT 9  
27

28 On or about, November 9, 2013, in the Eastern District of Washington, the  
Defendant, MARY ALICE HUNT, in connection with the acquisition of firearms, to wit:  
a Smith and Wesson Shield 9mm pistol, bearing serial number HPV 4091, and Sig-Sauer

1 Equinox 9mm pistol, bearing serial number 52A072604, and a Smith and Wesson  
2 Bodyguard .380 caliber pistol, bearing serial number KAN 4446, and a Smith and  
3 Wesson Ladysmith .38 caliber revolver, bearing serial number CUJ0563, from White  
4 Elephant #2, E. 12614 Sprague, Spokane, WA, a licensed dealer of firearms within the  
5 meaning of Chapter 44, Title 18, United States Code, knowingly made a false and  
6 fictitious written statement to T.T. which statement was intended and likely to deceive  
7 T.T., as to a fact material to the lawfulness of such sale of said firearms to the Defendant  
8 under Chapter 44 of Title 18, in that the Defendant represented that she was purchasing  
9 said firearms for herself when she knew she was purchasing the firearms for resale to  
10 another person; in violation of 18 U.S.C. §§ 922(a)(6), 924(a)(2).

11 COUNT 10

12 On or about November 9, 2013, in the Eastern District of Washington, the  
13 Defendant, MARY ALICE HUNT, in connection with the acquisition of firearms, to wit:  
14 a Smith and Wesson Bodyguard 380, .38caliber revolver, bearing serial number  
15 CUH9069, and Sig-Sauer P238,.380 caliber pistol, bearing serial number 27A214905,  
16 from White Elephant #1, 1730 N. Division, Spokane, WA, a licensed dealer of firearms  
17 within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false  
18 and fictitious written statement to R.V. which statement was intended and likely to  
19 deceive R.V., as to a fact material to the lawfulness of such sale of said firearms to the  
20 Defendant under Chapter 44 of Title 18, in that the Defendant represented that she was  
21 purchasing said firearms for herself when she knew she was purchasing the firearms for  
22 resale to another person; in violation of 18 U.S.C. §§ 922(a)(6), 924(a)(2).

23 COUNT 11  
24 *Eoh*

25 On or about July 27, 2013, ~~2012~~, in the Eastern District of Washington, the  
26 Defendant, MARY ALICE HUNT, in connection with the acquisition of firearms, to wit:  
27 a Charter Arms, Model Chick Lady, .38 caliber revolver, bearing serial number 13-  
28 16837, and a Ruger, Model LCR LG, bearing serial number 542-32770, from White  
Elephant #2, E. 12614 Sprague, Spokane, WA, a licensed dealer of firearms within the

1 meaning of Chapter 44, Title 18, United States Code, knowingly made a false and  
2 fictitious written statement to R.J. which statement was intended and likely to deceive  
3 R.J., as to a fact material to the lawfulness of such sale of said firearms to the Defendant  
4 under Chapter 44 of Title 18, in that the Defendant represented that she was purchasing  
5 said firearms for herself when she knew she was purchasing the firearms for resale to  
6 another person; in violation of 18 U.S.C. §§ 922(a)(6), 924(a)(2).

7 COUNT 12

8 On or about April 22, 2015, in the Eastern District of Washington, the Defendant,  
9 MARY ALICE HUNT, in connection with the acquisition of firearms, to wit: a Ruger  
10 Model LCR, .38 caliber revolver, bearing serial number 543-03357, and a Ruger Model  
11 LCR, .38 caliber revolver, bearing serial number 543-29073, from Stan's Merry Mart,  
12 Inc., 733 S. Wenatchee Ave., Wenatchee, a licensed dealer of firearms within the  
13 meaning of Chapter 44, Title 18, United States Code, knowingly made a false and  
14 fictitious written, statement to G.R., which statement was intended and likely to deceive  
15 G.R., as to a fact material to the lawfulness of such sale of said firearms to the Defendant  
16 under Chapter 44 of Title 18, in that the Defendant represented that she was purchasing  
17 said firearms for herself when she knew she was purchasing the firearms for resale to  
18 another person; in violation of 18 U.S.C. §§ 922(a)(6), 924(a)(2).

19 COUNT 13

20 On or about June 12, 2014, in the Eastern District of Washington, the Defendant,  
21 TERRY RUSSELL HUNT, in connection with the acquisition of firearms, to wit: a  
22 Glock Model 42, .380 caliber pistol, bearing serial number AATU232, and a Kimber  
23 Solo 9mm pistol, bearing serial number S1156588, from H.O.T.S., Inc., Hooked On  
24 Toys, located at 1444 N. Wenatchee, Ave., Wenatchee, WA, a licensed dealer of firearms  
25 within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false  
26 and fictitious written statement to S.S., which statement was intended and likely to  
27 deceive S.S., as to a fact material to the lawfulness of such sale of said firearms to the  
28 Defendant under Chapter 44 of Title 18, in that the Defendant represented that he was

1 purchasing said firearms for himself when he knew he was purchasing the firearms for  
2 resale to another person; in violation of 18 U.S.C. §§ 922(a)(6), 924(a)(2).

3 COUNT 14

4 On or about July 27, 2013, in the Eastern District of Washington, the Defendant,  
5 TERRY RUSSELL HUNT, in connection with the acquisition of firearms, to wit: a  
6 Springfield Model XDS .45 caliber pistol, bearing serial number XS 678438, and a  
7 Springfield, Model XDS 9 mm pistol, bearing serial number XS-911623, from White  
8 Elephant #2, E. 12614 Sprague, Spokane, WA, a licensed dealer of firearms within the  
9 meaning of Chapter 44, Title 18, United States Code, knowingly made a false and  
10 fictitious written statement to T.T. which statement was intended and likely to deceive  
11 T.T., as to a fact material to the lawfulness of such sale of said firearms to the Defendant  
12 under Chapter 44 of Title 18, in that the Defendant represented that he was purchasing  
13 said firearms for himself when he knew he was purchasing the firearms for resale to  
14 another person; in violation of 18U.S.C. §§ 922(a)(6), 924(a)(2).

15 COUNT 15

16 On or about November 26, 2014, in the Eastern District of Washington, the  
17 Defendant, TERRY RUSSELL HUNT, in connection with the acquisition of firearms, to  
18 wit: a, Kimber Solo 9mm pistol, bearing serial number S1160664, and a Kimber Solo  
19 9mm pistol, bearing serial number S1135246, from H.O.T.S., Inc., Hooked on Toys,  
20 1444 N. Wenatchee, Ave., Wenatchee, WA, a licensed dealer of firearms within the  
21 meaning of Chapter 44, Title 18, United States Code, knowingly made a false and  
22 fictitious written statement to S.S., which statement was intended and likely to deceive  
23 S.S., as to a fact material to the lawfulness of such sale of said firearms to the Defendant  
24 under Chapter 44 of Title 18, in that the Defendant represented that he was purchasing  
25 said firearms for himself when he knew he was purchasing the firearms for resale to  
26 another person; in violation of 18U.S.C. §§ 922(a)(6), 924(a)(2).

1 COUNT 16  
2

3 On or about June 10, 2014, in the Eastern District of Washington, the Defendant,  
 4 TERRY RUSSELL HUNT, in connection with the acquisition of firearms, to wit: a  
 5 Glock Model 42, .380 caliber pistol, bearing serial number ATTS368, and a Smith and  
 6 Wesson, M&P 9 Shield 9mm pistol, bearing serial number HSB6299, from Stan's Merry  
 7 Mart, Inc., 733 S. Wenatchee Ave., Wenatchee, WA, a licensed dealer of firearms within  
 8 the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and  
 9 fictitious written statement to D.W., which statement was intended and likely to deceive  
 10 D.W., as to a fact material to the lawfulness of such sale of said firearms to the Defendant  
 11 under Chapter 44 of Title 18, in that the Defendant represented that he was purchasing  
 12 said firearms for himself when he knew he was purchasing the firearms for resale to  
 another person; in violation of 18 U.S.C. §§ 922(a)(6), 924(a)(2).

13 **NOTICE OF FORFEITURE ALLEGATIONS**

14 The allegations contained in the Indictment are hereby re-alleged and incorporated  
 15 herein by this reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. §  
 16 924(d)(1) and 28 U.S.C. § 2461(c).

17 Pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), upon conviction of an  
 18 offense in violation of 18 U.S.C. §§ 922(a)(1)(A), 371, as set forth in Count 1 of this  
 19 Indictment, Defendants TERRY RUSSELL HUNT, MARY ALICE HUNT, RUSSELL  
 20 MELVIN HUNT, and DEREK JON HUNT, shall forfeit to the United States, any  
 21 firearms and ammunition involved in the commission, including, but not limited to:

22 Seized on or about November 13, 2015

- 23 1. Colt Unknown Revolver, Caliber: .38, SN: 229805;
- 24 2. Smith & Wesson 686 Revolver, Caliber: .357, SN: ADW7868;
- 25 3. Colt Ace Pistol, Caliber: .22, SN: 400521;
- 26 4. Smith & Wesson 19 Revolver, Caliber: .357, SN: 1K53943;
- 27 5. Colt SAA Revolver, Caliber: .45, SN: S28967A;
- 28 6. Ruger Bearcat Revolver, Caliber: .22 SN: 91-30370;
- 7. Smith & Wesson 27 Revolver, Caliber: .357 SN: N81284;

- 1 8. Smith & Wesson 41 Pistol, Caliber: .22 SN: 12923;
- 2 9. Beretta, Pietro S.P.A 86 Pistol, Caliber: .380 SN: G08577Y;
- 3 10. Beretta USA Corp 21A Pistol, Caliber: .22 SN: BCS27326U;
- 4 11. Rifles Inc., Caliber: 7mm, SN: S6269094;
- 5 12. Stevens Unknown Rifle, Caliber: .22LR, SN: K16;
- 6 13. Glock, Inc. 32 Pistol, Caliber: .357, SN: FDH648;
- 7 14. Ruger 10/22 Rifle, Caliber: .22, SN: 82102649;
- 8 15. Benelli Super Black Eagle Shotgun, Caliber: 12 gauge, SN: U121684;
- 9 16. Winchester 37 Shotgun, Caliber: .410, SN: None;
- 10 17. Bond Arms Inc. Snake Slayer Derringer, Caliber: 45/410, SN: 62777;
- 11 18. Winchester 94 Rifle, Caliber: 25-35, SN: 1605994;
- 12 19. Winchester 94 Rifle, Caliber: .30, SN: 1396790;
- 13 20. Winchester 62A Rifle, Caliber: .22, SN: 353115;
- 14 21. Smith & Wesson M&P 15-22 Rifle, Caliber: .22, SN: DZY6082;
- 15 22. Ithaca Gun Co. Hammerless Shotgun, Caliber: 12 gauge, SN: 114666;
- 16 23. Colt Frontier Scout Revolver, Caliber: .22, SN: 180922F;
- 17 24. Remington Arms Company, Inc. 700 Rifle, Caliber: .280, SN: C6393169;
- 18 25. Barrett Firearms Mfg. Co. 99 Rifle, Caliber: .50 BMG, SN: 1688;
- 19 26. Uberti, Aldo 1873 Dakota Revolver, Caliber: .45, SN: 76158;
- 20 27. Browning Auto Rifle, Caliber: .22, SN: 12448PY146;
- 21 28. F.N. (FN Herstal) FNAR Rifle, Caliber: .762, SN: 319MN03564;
- 22 29. Sig-Sauer P220 Pistol, Caliber: .22, SN: G424321;
- 23 30. Ruger Creedmoor Rifle, Caliber: 6.5 mm, SN: 694-53677;
- 24 31. F.N. (FN Herstal) Mauser Rifle, Caliber: .270, SN: X0744
- 25 32. Ruger 10/22 Rifle, Caliber: .22, SN: 25080832;
- 26 33. Sako L61R Finnbear Rifle, Caliber: .30-06, SN: 518682;
- 27 34. Smith & Wesson Unknown Rifle, Caliber: .270, SN: 327054;
- 28 35. USA F MFG 22 Revolver, Caliber: .22LR, SN: 22835;
36. Sig Sauer (Sig-Arms) Sig M400 Rifle, Caliber: .556, SN: 20C047273;
37. Browning BL Rifle, Caliber: .22, SN: 71B32828;
38. Winchester 70 Rifle, Caliber: .257, SN: 43641;
39. Sig-Sauer 1911 Pistol, Caliber: .45, SN: 54B091082;
40. Stag Arms Stag-15 Rifle, Caliber: .556, SN: 256668;
41. Miroku Firearm Co. Unknown Rifle, Caliber: Unknown; SN: 02178PN136;
42. Sako L61R Finnbear Rifle, Caliber: .375, SN: 509768;
43. Rock River Arms, Inc. AR 15 Rifle, Caliber: .556, SN: LH104728;

- 1       44.     Rifle Works, Caliber: 7mm, SN: C6598828;
- 2       45.     Winchester 70 Rifle, Caliber: .30-06, SN: 287;
- 3       46.     F.N. (FN Herstal) Mauser Rifle, Caliber 7mm, SN: X0307;
- 4       47.     Lewis Machine and Tool Co. Defender 2000 Rifle, Caliber: .556, SN: 65056;
- 5       48.     Juggernaut TactiCaliber, Inc. JT-10 Rifle, Caliber: .762, SN: B23970D;
- 6       49.     Savage 11 Rifle, Caliber 6.5mm, SN: J825739;
- 7       50.     Henry Repeating Rifle Company Golden Boy Rifle, Caliber: .22, SN: GB432946;
- 8       51.     Blaser (Blaser Jagdwaffen GMBH) R93 Rifle, Caliber: .223, SN: BC-05242;
- 9       52.     Blaser (Blaser Jagdwaffen GMBH) R93 Rifle, Caliber: 7mm, SN: BC-04666;
- 10      53.     Winchester 94 Rifle, Caliber: .30-30, SN: 6331790;
- 11      54.     Great Guns 7mm Rifle, SN: S6237365;
- 12      55.     Winchester M70 Rifle, SN: 271538;

13           Seized on or about December 2, 2015

- 14      56.     Mossberg 464 Rifle, Caliber: .30-30, SN: LA061324;
- 15      57.     Ruger Precision Rifle, Caliber: .308, SN: 1800-05104
- 16      58.     Mossberg 151MB Rifle, Caliber: .22, SN: None;
- 17      59.     Savage Arms, Inc., CD 42 Combination Gun, Caliber: .22/410, SN: H856503;
- 18      60.     Remington Arms Company, Inc., 700 Rifle, Caliber: 7mm, SN: S6387446;
- 19      61.     Unknown Manufacturer AR15 Rifle, Caliber: .223, SN: D14382B;
- 20      62.     Winchester 70 Rifle, Caliber: .30-06, SN: 374956;
- 21      63.     Kimber Solo CDP Pistol, Caliber: 9mm, SN: S1140651;
- 22      64.     Izhmash (IMEZ) Saiga-12 Shotgun, Caliber: 12 gauge, SN: H09412792;
- 23      65.     Unknown Manufacturer AR15 Rifle, Caliber: .556, SN: D44812B;
- 24      66.     Stonefire Arms, LLC, SFA-15 Rifle, Caliber: .556, SN: A100079;
- 25      67.     Rock River Arms, Inc., AR 15 Rifle, Caliber: .556, SN: CM74218;
- 26      68.     Gaucha IGA Shotgun, Caliber: 20 gauge, SN: 862039;
- 27      69.     Stag Arms Stag-15 Rifle, Caliber: 556 SN: 256185;
- 28      70.     CZ USA 452 Scout Rifle Caliber: .22LR, SN: A096252;
- 29      71.     Palmetto State Armory PA-15 Rifle, Caliber: .556, SN: LW130272;
- 30      72.     Kimber Micro Carry Pistol, Caliber: .380, SN: T0014930;
- 31      73.     Smith & Wesson PC1911 Pistol, Caliber: .45, SN: UCY0417;

1       74. Smith & Wesson 648 Revolver, Caliber: .22, SN: BHJ9249;  
2       75. Smith & Wesson 642 Revolver, Caliber: .38, SN: CRA7616;  
3       76. Smith & Wesson Bodyguard Revolver, Caliber: .38, SN: CXX5883;  
4       77. Glock Inc., 17 Pistol, Caliber: 9mm, SN: TKC181;  
5       78. Smith & Wesson 637-2 Pistol, Caliber: .38, SN: CRD6671;  
6       79. Glock Inc. 43 Pistol, Caliber: 9mm, SN: ZXK553;  
7       80. Sig-Sauer 1911 C3 Pistol, Caliber: .45, SN: GS79082;  
8       81. Ruger LCR Revolver, Caliber: .38, SN: 543-03357;  
9       82. Glock Inc. 21 Pistol, Caliber: .45, SN: HMM766;  
10      83. Glock Inc. 42 Pistol, Caliber: .380, SN: ABHT193;  
11      84. Ruger LCR Revolver, Caliber: .38, SN: 543-29073;  
12      85. Glock Inc. 45 Pistol, Caliber: 9mm, SN: BABS921;  
13      86. Glock Inc. 19 Pistol, Caliber: 9mm, SN: WSW199;  
14      87. Glock Inc. 19 Pistol, Caliber: 9mm, SN: RRU153;  
15      88. Ruger LCR Revolver, Caliber: 9mm, SN: 549-61096;  
16      89. Ruger LCR Revolver, Caliber: .38, SN: 542-20381;  
17      90. Israel Weapon IND-IWI (Israel Military IND-IMI) Desert Eagle, Caliber:  
18       .50, SN: 95203762;  
19      91. Keltec, CNC Industries, Inc. PMR-30 Pistol, Caliber: .22, SN: WXS77;  
20      92. Beretta USA Corp BU9 Nano Pistol, SN: NU094018;  
21      93. Sig-Sauer 1911 Pistol, Caliber: .45, SN: 54B108738;  
22      94. Smith & Wesson M&P 9.Shield Caliber: 9mm, Pistol, SN: HWR2225;  
23      95. Sig-Sauer P938 Pistol, Caliber: 9mm, SN: 52A024553;  
24      96. Glock Inc. 32 Pistol, Caliber: .357, SN: ETL139US;  
25      97. Keltec, CNC Industries, Inc. PMR-30 Pistol, Caliber: .22, SN: WXS73;  
26      98. Keltec, CNC Industries, Inc. PMR-30 Pistol, Caliber: .22, SN: WXS78;  
27      99. Keltec, CNC Industries, Inc. PMR-30 Pistol, Caliber: .22, SN: WXS75;  
100.     100. Sig Sauer (Sig-Arms) P938 Pistol, Caliber: 9mm, SN: 52B142772;  
101.     101. Sig Sauer (Sig-Arms) P938 Pistol, Caliber: .22, SN: 52B051643;  
102.     102. Smith & Wesson M&P Caliber: 9mm, Shield Pistol, SN: HKC7899;  
103.     103. Taurus International The Judge Revolver, Caliber: .45/410, SN: IU158697;  
104.     104. Smith & Wesson 10-6 Revolver, Caliber: .38, SN: D996600;  
105.     105. Smith & Wesson 10-8 Revolver, Caliber: .38, SN: 9D89438;  
106.     106. Taurus International The Judge Revolver, Caliber: .45/410,  
107.       SN: CP771584;

- 1        107.     Smith & Wesson 10-5 Revolver, Caliber: .38, SN: C935163;  
2        108.     Colt Bisley Revolver, Caliber: .32, SN: 312059;  
3        109.     Smith & Wesson 63 Revolver, Caliber: .22, SN: 7145;  
4        110.     Glock Inc. 27 Pistol, Caliber: .40, SN: NDD346; and,  
5        111.     Smith & Wesson 66 Revolver, Caliber: .357, SN: CFT9446

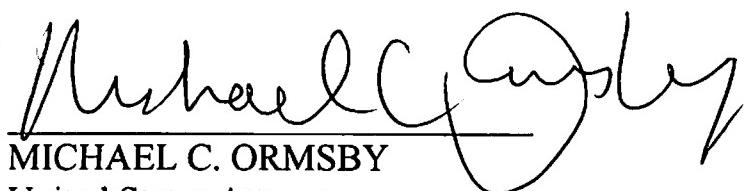
6        If any of the property described above, as a result of any act or omission of any of  
the Defendants:

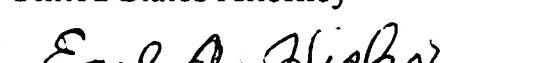
- 7              (a)     cannot be located upon the exercise of due diligence;  
8              (b)     has been transferred or sold to, or deposited with, a third party;  
9              (c)     has been placed beyond the jurisdiction of the court;  
10             (d)     has been substantially diminished in value; or  
11             (e)     has been commingled with other property which cannot be divided without  
12             difficulty;

13        the United States shall be entitled to forfeiture of substitute property pursuant to 21  
14 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c). All pursuant to 18 U.S.C. §  
15 924(d) and 28 U.S.C. § 2461(c).

16        Dated this 20<sup>th</sup> day of December, 2016.

17  
18             A TRUE BILL

21          
22        MICHAEL C. ORMSBY  
23        United States Attorney

24  
25          
26        Earl A. Hicks  
27        Assistant United States Attorney